UNITED STATES DISTRICT COURT SOUTH DAKOTA
RAPID CITY DIVISION

FILED

JAN 2 4 2018

Holli Telford)

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·Civil No. 17- 5042 ~~Matthew~~ CLERK

Plaintiffs)

Ron A. Bradeen, Bradeen)
Real Estate, Jeff Storm, Jim Bultsma
Jim Ashmore, Southern Hills Title)
Company, Morningside Properties LLP;
Heartland Real Estate; Verylis R. Boyd,)
Warner C. Boyd, Fall River County
Sheriff Robert Evans an SA Dane)
Rasmussen in their official capacities

)

Defendants

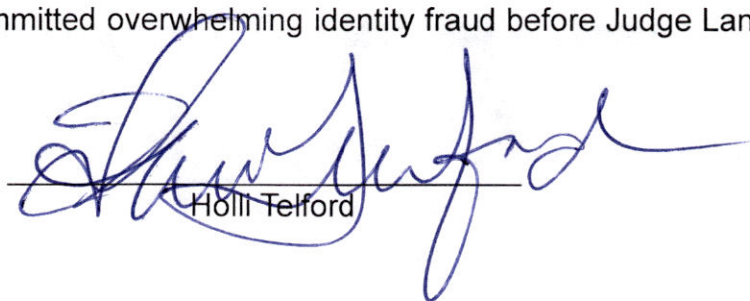**REQUEST TO TAKE JUDICIAL NOTICE OF FORGED AND BACK DATED DEED IN THIS ACTION**

Plaintiffs hereby request that this court take judicial notice of the back dated and forged DEED that the defendants file in this action plus other undisputed facts supporting Plaintiffs fraud claims against the defendants.   The following facts are undisputed by the attached record.

1. The deed bears a signature date of the owners of December 6, 2016.

2.   The Deed was notarized by a notary whose notarial jurat was EXPIRED TWO MONTHS BEFORE the DEED was executed by the owners Verylis Boyd and Warner Boyd through their attorney Gerald Baldwin; thus making the deed VOID as a matter of law.

3.   The DEED was recorded with the Fall River County Register of Deeds three weeks AFTER this action was filed and three weeks AFTER Judge Roberto Lange dismissed USDC case no. 16-CV-3033 for lack of venue in the state of South Dakota and threatened Plaintiffs with a felony fictitious address charge 18 USC 1342 on May 1. 2017.

4.   The attorney preparing the deed works with Southern Hills Title Company and had prepared the deed allegedly while Souther Hills Title company was the escrow agent on

this transaction.

      5.   Southern Hills attorney in this action represented CENTURYLINK in the action before Judge Lange's court and committed overwhelming identity fraud before Judge Lange's court.

Dated: January 23, 2018

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Holli Telford

Certificate of Service
    The above signed verifies that this document will be placed into the court's ecf filing systems and served on all parties.